

REMARKS/ARGUMENTS:

Claims 1-20 are pending in this application. In the Office Action dated February 13, 2006, the Examiner has rejected claims 1-13 and 15-20 under 35 USC 102(e) as anticipated by Arimilli (US Pat. 6,990,545), has rejected claim 14 under 35 USC 103(a) as obvious over Arimilli in view of ordinary skill in the art.

As an initial matter, both the present application and Arimilli are assigned to a common assignee, IBM Corp. of Armonk, NY. At the time of the invention of the present application, the inventors were under an obligation to assign this invention to IBM Corp. Arimilli's earliest publication date is seen to be October 28, 2004, which is later in time than the present application's filing date of January 14, 2004. Arimilli is seen to qualify as prior art against the present application only under 35 USC 102(e), so the provisions of 35 USC 103(c)(1) therefore apply. Arimilli may not be used in any obviousness rejection against claims of the present application, and therefore the rejection to claim 14 is seen as improper. Claim 14 is re-written in independent form, and should now be in condition for allowance.

Arimilli is seen to be directed to shared multiprocessor servers (Element0 and Element1 of Figures 3A-B, col. 7 lines 1-5) that may be coupled together by hot-plug connectors to form a larger symmetric multiprocessor SMP system (col. 6 lines 57-61). Arimilli describes SMP systems as commercial systems at col. 2 line 46, and the problem Arimilli's invention addresses is stated at col. 4 lines 38-46: to extend hot-plug functionality of plug-and-play components to a large-scale server system. In contradistinction, the present claims each recite a portable storage device in the context of a host device. Two servers of Arimilli, coupled by the hot-plug teachings therein, are not seen to be analogous to a portable storage device coupled to a host device.

To make the distinction unambiguous, each of the originally-filed independent claims, claims 1, 5 and 15, are amended to recite that "the host device has an operating system that logically recognizes the portable storage device as additional local memory" (similar language in claims 5 and 15). Support for this amendment is throughout the written description, most particularly at paragraphs [0003] (the portable device is functionally treated as an additional drive by the OS of the host device; and an additional storage location for moving/copying files between drives); [0005] (a command to the OS of the host device removes the portable

storage device); [0031] (the host device has a processor 22A that receives an interrupt message and begins a shutdown sequence for the portable device); [0032] (the host computer OS logically 'sees' the portable device as a drive similar to its own internal storage media); and [0033] (the OS disables the portable device). Claims 2 and 12 are amended to provide proper antecedent basis given the amendments to their respective independent claims.

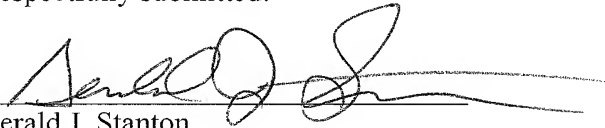
Each of the server elements of Arimilli include multiple processors 201, 202, and each server element (element0 and element1) operates with an operating system OS separate from that of the other server element. See for example col. 5 lines 9-14 (the service element begins allocating *workload* to the new element); col. 6 lines 52-56 (service element 212 notifies the OS of *additional processor resources* within the MP *as well as addition/removal of other system resources such as memory* and I/O); and col. 5 lines 1-3 (two multiprocessor systems are coupled to form a larger *symmetric* MP). In no instance is one of the Arimilli server elements seen to logically or functionally recognize a memory in the other element as a local drive, at least because the memory 204 in each element is under the control of a processor 201, 202 of that same element and recognized by the OS of that/those *other* processors as a local drive. When the symmetric Arimilli elements are coupled to form a larger SMP, the processor/OS of one element can gain access to a memory of the other element only through the processor and OS of that other element, so would not logically or functionally 'see' the memory of the other element as local to itself.

Further, Arimilli concerns an on-off reboot problem for hot-pluggable servers, which is fundamentally distinct from a portable storage device coupled to a *host* device. Each server is a stand-alone unit that may function independently of other servers, hence the symmetric aspects of Arimilli's element0 and element1. Arimilli repeatedly discloses that a technician performs hot-plugging and hot-unplugging of servers into and out of the larger SMP. A technician is generally not considered necessary for removing a portable storage device such as a flash drive/memory stick from a host device such as a personal computer/camera. While both Arimilli and the present invention are both directed to the computing arts in general, coupled servers such as the symmetric servers of Arimilli that together form a larger SMP are not functionally similar to a portable storage device coupled to a host device, for the simple reason that neither element of Arimilli may be considered as *host* to the other element; Arimilli's servers are each stand-alone entities and none act as host to another.

Arimilli does describe hot pluggable components such as memory that plug into a hot-plug memory expansion port, at col. 6 lines 4-6, col. 9 lines 43-56 (reference numbers 504A and 504B of Figure 5). At col. 5 lines 53-55, Arimilli describes Figure 5 as a data processing system. However, there are seen no disclosure in Arimilli that an expansion *component* such as the additional memory 504A, 504B may themselves have a button similar to element 225 on the servers. Note that each pending independent claim recites either manual input at an actuator *of* a portable storage device (claim 1) or that the portable storage device *comprises* a manual actuator (claims 5, 14 and 15).

The Examiner is respectfully requested to review the cited art in view of the above detailed arguments and claim amendments, to withdraw the rejections, and to pass claims 1-20 to issue. The undersigned representative welcomes the opportunity to resolve any matters that may remain, formal or otherwise, via teleconference at the Examiner's discretion.

Respectfully submitted:


Gerald J. Stanton
Reg. No.: 46,008

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Date

Customer No.: 29683
HARRINGTON & SMITH, LLP
4 Research Drive
Shelton, CT 06484-6212
Phone: (203) 925-9400
Facsimile: (203) 944-0245
Email: gstanton@hspatent.com

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April 28, 2006
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